



S P I R E   L A W

Ian E. Smith  
ian@spirelawfirm.com  
407.494.0135

Spire Law, LLC  
2572 W State Rd 426  
Suite 2088  
Oviedo, FL 32765

[spirelawfirm.com](http://spirelawfirm.com)

Via Electronic Filing

December 6, 2023

The Honorable Judge LaShann DeArcy Hall and  
The Honorable Magistrate Judge Marcia M. Henry  
U.S. District Court, Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re.: Colmenares Ojeda v. Pronto Pizzeria Corp. et al (1:23-cv-07892)

Dear Judge DeArcy Hall:

We represent Defendants, Pronto Pizzeria Corp., and Giuseppe Ciccotta in the above-referenced matter. Defendant was served on November 28, 2023. Based on that service, the current deadline for Defendants to respond to the Complaint is December 19, 2023.

The undersigned counsel files this letter motion on behalf of Defendants, Pronto Pizzeria Corp. and Giuseppe Ciccotta, with Plaintiff's consent, respectfully requesting an extension of time for Defendants, Pronto Pizzeria Corp. and Giuseppe Ciccotta, to answer, move, or otherwise respond to the Complaint to January 9, 2023. Defendants, Pronto Pizzeria Corp. and Giuseppe Ciccotta, request the extension of time to respond to the Complaint as Defendants, Pronto Pizzeria Corp. and Giuseppe Ciccotta, recently retained undersigned counsel and is in the process of intaking and reviewing Defendant's files relevant to the underlying litigation. Defendants waives any personal service defenses.

This is Defendants, Pronto Pizzeria Corp. and Giuseppe Ciccotta, first request for an extension of time to respond to the Complaint.

Plaintiff does not oppose an extension of Defendants, Pronto Pizzeria Corp. and Giuseppe Ciccotta, time to respond to the Complaint so that Defendants may adequately respond to the



Complaint and the parties may explore potentially resolving this matter. Additionally, Defendants asks that the Court accordingly extend all other case deadlines, including the initial court conference.

We thank the Court for its attention to this matter.

Respectfully,

A handwritten signature in black ink, appearing to read "Ian E. Smith".

Ian E. Smith, Esq.  
Partner, Spire Law, LL

